



Hughes certain wages they claim they are entitled to receive, and that Defendant Teamsters Local 623 failed to represent them by pursuing their grievance. The grievance and arbitration process is contained in a collective bargaining agreement between Defendants UPS and Teamsters Local 623.

4. Plaintiffs' claims arise under 29 U.S.C. § 185, which provides that a suit for violation of a collective bargaining agreement may be brought against a labor organization "in any district court of the United States having jurisdiction of the parties, without respect to the amount in controversy or without regard to the citizenship of the parties." Accordingly, removal of this action is proper pursuant to 28 U.S.C. § 1441(a) and (b).

WHEREFORE, Defendant International Brotherhood of Teamsters Local 623 requests that the above action now pending in the Court of Common Pleas of Philadelphia County, be removed to this Court.

Respectfully submitted,

Dated: June 19, 2014

/S/ Neal Goldstein  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 19<sup>th</sup> day of June 2014, a copy of the foregoing Notice of Removal was served by U.S. Mail on the following:

Matthew B. Weisberg, Esq.  
Weisberg Law, PC  
7 S. Morton Avenue  
Morton PA 19070

Dated: June 19, 2014

/S/Neal Goldstein  
NEAL GOLDSTEIN